

APPENDIX 3



Phillips 66
Los Angeles Refinery – Wilmington or MT Plant
1660 West Anaheim Street
Wilmington, CA 90744
P.O. Box 758
Wilmington, CA 90748-0758
Telephone (310) 952-6000
www.phillips66.com

CERTIFIED MAIL RETURN RECEIPT REQUESTED

October 16, 2015

Richard M. Francis
U.S. EPA Region 9
75 Hawthorne St. (ENG-2-2)
San Francisco, CA 94105-3901

RESPONSE TO CLOSEOUT FEEDBACK **PHILLIPS 66 COMPANY LOS ANGELES REFINERY** **WILMINGTON PLANT; EPA ID NO. CAD008237679**

Mr. Francis:

Phillips 66 Company ("Phillips 66") appreciates the feedback provided by your team during the agency's closeout meeting on August 28, 2015. This letter documents improvements that we have made to address certain agency concerns raised and discussed during the closeout meeting.

- Agency Observation – Five gallon bucket without hazard communication label
The five-gallon bucket was determined to be soap. Phillips 66 is also developing pre-printed hazard communication labels for this soap and other commonly used materials
- Agency Observation – Baker tanks holding sludge without hazard communication labels
Hazardous communication labels were placed on the Baker tanks and Phillips 66 is also developing pre-printed hazard communication signs for this sludge and other commonly used materials
- Agency Observation – Roll off bin under press at Selenium Plant appeared to be leaking liquids into secondary containment
Malfunction of the press resulted in liquids collecting in bin and secondary containment area. We have repaired the press and pumped the liquids back into process tank
- Agency Observation – Roll off bin under press at Selenium Plant was not covered
Hose was located inside bin to remove liquids collected as a result of press malfunction. We have repaired the press and pumped the liquids back into process tank
- Agency Observation – Roll off bin under press at Selenium Plant holds over 55 gallons
Roll off bin under press is listed under a Hazardous Waste Treatment Conditional Authorization Permit

LARW – 2015 EPA Inspection
Response to Closeout Feedback

- Agency Observation – Where does Tank 0 at Lab oil go to?
Oil from Tank 0 at the Lab goes to recovered oil
- Observation – Contaminated PPE need to decide if trash or satellite drum
Phillips 66 is revising our Satellite Containers procedure which will re-emphasize to all personnel that oily rags and PPE are to be placed in PPE satellite containers. We are also developing additional signage to be placed at or near regular trash containers that prohibits oily rags and PPE from being deposited in the containers.
- Observation – Should have refresher training on satellite containers
Phillips 66 is revising our Satellite Containers procedure and will push out revised procedure to all personnel once finalized.

If you have any questions, please contact Cheryl Cobb at (310) 952-6210.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Waller", written over the printed name.

Marshall G Waller
Environmental Director

